REMARKS

In the application claims 21, 23, 24, 27-29, 31, 34-36, 39, 44, 46, 48-50, 56-58, 64, and 65 remain pending. Claims 1-20, 22, 25, 26, 30, 32, 33, 37, 38, 40-43, 45, 47, 51-55, and 59-63 have been canceled.

In the Office Action all of the pending claims were rejected under 35 U.S.C. § 102 as allegedly being anticipated by Mott (U.S. Patent No. 6,170,060). The reconsideration of the rejection of the claims is, however, respectfully requested.

In rejecting the claims it was asserted that Mott discloses a local server (or equivalent) in client computer system 214, a remote facility (or equivalent) storing content to be downloaded to the local server via a WAN in library server 260, and a device for receiving downloaded content from the local server via a LAN in playback device 212. It is, however, respectfully noted that, while Mott does disclose a system in which playable content is transferred from the library server 260 to the client computer system 214 (Col. 5, lines 32-39) whereupon the downloaded, playable content is transferred, via mobile device interface 221, to *any/all* client device(s) coupled to the client computer system 214 (Col. 5, lines 15-31), Mott makes no mention of interacting with the client computer system 214 to establish a "schedule" for automatically delivering content *from the client computer system 214 to a playback device 212 at a specified time after* content is downloaded from the library server 260 to the client computer system 214 or interacting with the client computer system 214 **to associate a particular playback device** with content *to be downloaded* (i.e., creating an association before downloading) for the purpose of automatically delivering content to a playback device *after that content is actually downloaded* from the library server 260 to the client computer system 214 as is recited in the claims at issue. Accordingly, because Mott does not disclose at least these claimed elements, the rejection under 35 U.S.C. § 102 must be withdrawn. *Akzo N.V. v. United States Int'l Trade Comm'n*, 808 F.2d 1471, 1479 (Fed. Cir.

1986) ("anticipation requires that each and every element of the claimed invention is described in a single reference.").

As concerns the Examiner's reliance upon the disclosure within Mott in Col. 11, lines 1-25 that content may be downloaded *from the library server 260* (i.e., the WAN server) to the client computer system 214 at either the time of purchase or "sometime after the purchase," it is respectfully noted that this disclosure fails to disclose, teach, or suggest interacting with a client computer 214 itself to provide **a scheduled time** for automatically delivering content *from the client computer system 214 to a playback device 212* via a LAN ***after*** content is downloaded from the library server 260 to the client computer system 214 as is set forth within the claims. Furthermore, it is respectfully submitted that the disclosed downloading of content *from the information library server 260* to the client computer 214 "sometime after purchase" or "multiple times after an initial purchase" that is relied upon by the Examiner does not infer that which is claimed but instead infers that a user may visit the library server 260 "sometime after purchase" or "multiple times after an initial purchase" and, at that time, manually cause the content to be again downloaded from the library server 260 to the client computer 214. As will be appreciated, this is in direct contrast to that which is claimed. Accordingly, because Mott simply fails to expressly or inherently disclose the exact invention that is set forth within the claims as is required to maintain a rejection under 35 U.S.C. § 102, e.g., Mott fails to disclose, teach, or suggest scheduling a time with a LAN server at which time stored, retrieved content (content *that has already been downloaded* to the LAN server from a remote facility via a WAN) is automatically delivered from the LAN server to a playback device via a LAN, it is respectfully submitted that the rejection of the claims under 35 U.S.C. § 102 must be withdrawn.

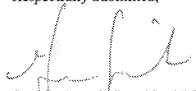
As concerns the Examiner's reliance upon the disclosure within Mott in Col. 8, lines 17-19 that generally describes that client identifiers are used "to target content for playback

on individual mobile playback devices 212" and in Col. 13, lines 6-25 that the *library server 260* includes a player ID table, it is respectfully noted that this general disclosure has no relevance to the invention claimed. In this regard, Mott particularly describes that "targeting content" is nothing more than a means/method for using client identifiers to limit the ability to playback any content that has been downloaded into an unauthorized mobile playback device 212. (Col. 12, lines 19-22; Col. 13, lines 44-57), i.e., this disclosure infers that content is provided to ALL devices but only "targeted" devices can actually play the content. This is clearly in contrast to that which is claimed. Furthermore, it is respectfully noted that maintaining a player ID table 266 *at the library server 260* (i.e., the WAN server) does not disclose, teach, or suggest interacting with the client computer 214, i.e., the computer that receives content from the library server 260, to associate content *to be retrieved* with at least one device to which that content, after it is retrieved and stored, is to be automatically delivered as is claimed. Accordingly, because Mott simply fails to expressly or inherently disclose the exact invention that is set forth within the claims as is required to maintain a rejection under 35 U.S.C. § 102, e.g., Mott fails to disclose, teach, or suggest a local server being provided with input, via a GUI or otherwise, the functions to ***pre-associate*** a playback device with content that is to be downloaded to thereby automatically deliver content to that playback device after that content is actually downloaded to the local server from a library server via a WAN, it is respectfully submitted that the rejection of the claims under 35 U.S.C. § 102 must be withdrawn.

CONCLUSION

It is respectfully submitted that the application is in good and proper form for allowance. Such action on the part of the Examiner is respectfully requested.

Respectfully Submitted;



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